

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE BEAR STEARNS MORTGAGE
PASS-THROUGH CERTIFICATES
LITIGATION

Case No. 1:08-cv-08093-LTS

**LEAD COUNSEL’S NOTICE OF MOTION AND
MOTION FOR AN AWARD OF ATTORNEYS’ FEES
AND REIMBURSEMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that, pursuant to the Court's February 19, 2015 Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 268, the "Preliminary Approval Order"), on May 27, 2015, at 10:00 a.m. in Courtroom 12D at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, the Honorable Laura Taylor Swain presiding, Co-Lead Counsel Bernstein Litowitz Berger & Grossmann LLP and Cohen Milstein Sellers & Toll PLLC will, and hereby do, move for an award of attorneys' fees and reimbursement of litigation expenses in connection with the proposed Settlement in this Action.

This application is based upon the Memorandum of Law in Support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, the Joint Declaration of David R. Stickney and Daniel S. Sommers in Support of Motion for Final Approval of Settlement and Plan of Allocation, and Motion for Approval of Attorneys' Fees and Expenses, the exhibits thereto, the record and proceedings in this Action, and such other matters as the Court may consider at the time of the hearing.

Certification Pursuant to the Court's Individual Practices

Pursuant to Section A(2)(b)(ii) of this Court's Individual Practices, Lead Plaintiffs certify that they are unaware of any opposition to this Motion. As set forth in the Court's Preliminary Approval Order, the deadline for filing any objection to the request for attorneys' fees and expenses is May 6, 2015. In the event that any objections are received, Lead Plaintiffs will address them in their Reply to be filed on May 13, 2015.

Dated: April 22, 2015
San Diego, California

Respectfully submitted,

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